

June 30, 2022

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**VIA ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

***Schansman et al. v. Sberbank of Russia PJSC et al.*, No. 1:19-cv-02985-ALC-GWG (S.D.N.Y.)  
– Plaintiffs’ Request to Extend the Discovery Schedule**

Dear Judge Gorenstein:

We write on behalf of Plaintiffs in the above-captioned case to request, in accordance with Section 1.E of Your Honor’s Individual Practices, an extension of the discovery schedule that the Court ordered on October 27, 2021. *See* ECF No. 197. The extension is necessary due to, among other things, delays in discovery resulting from counsel for Sberbank of Russia PJSC (“Sberbank of Russia”) and VTB Bank PJSC (“VTB”) moving to withdraw as counsel of record and delays in the production of documents from all defendants (including as a result of the position taken by Sberbank of Russia and VTB that Russian law prohibits the production of almost all relevant documents in this case). This is the first request for an extension of the discovery schedule.

Plaintiffs requested consent from Defendants to the proposed extension on June 27, 2022. VTB indicated that it did not object to Plaintiffs’ proposal. Counsel for Sberbank of Russia stated that it considered its withdrawal as counsel for Sberbank of Russia to have been effective as of June 24, 2022, and requested that “all counsel please omit Debevoise from future correspondence addressed to counsel for parties in the action.”<sup>1</sup>

Counsel for Plaintiffs (Jason P. Hipp) emailed counsel for MoneyGram (Amy McKinlay) on June 29, 2022 to request a meet and confer prior to filing this request with the Court. Counsel for Plaintiffs (Mr. Hipp and Susanna D. Evarts) conferred with counsel for MoneyGram (Ms. McKinlay and Allison Eisen) by telephone on June 30, 2022 at 3:00 PM for approximately 5 minutes. Counsel for MoneyGram did not agree to Plaintiffs’ proposed schedule, took the position that an extension request is premature, and requested that MoneyGram have until July 12, 2022 to respond to Plaintiffs’ proposed extension. In light of the Parties’ inability to agree on the case

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<sup>1</sup> Plaintiffs note that as of the date of this letter, the Court had not granted Debevoise & Plimpton’s motion to withdraw as counsel. *See* ECF No. 374.

schedule and to promptly raise with the Court the need for an extension, Plaintiffs informed counsel for MoneyGram that they intended to apply to the Court for an extension.

Plaintiffs propose the following amended schedule for this case:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
All party document discovery in response to initial requests shall be substantially completed	July 19, 2022	January 17, 2023
Service of any additional requests for documents and interrogatories	November 15, 2022	May 16, 2023
Completion of all non-expert discovery	January 13, 2023	July 11, 2023
Parties may move to amend the pleadings or join any other parties	February 3, 2023	August 8, 2023
Expert disclosures on issues as to which the disclosing party bears the burden of proof as required by Rule 26(a)(2)(A), (B) or (C), including the identities and reports of experts	March 17, 2023	September 12, 2023
The disclosure of expert evidence intended by a party solely to contradict or rebut expert evidence on the same subject matter disclosed by the opposing party	May 18, 2023	November 14, 2023
Depositions of experts	June 23, 2023	January 16, 2024
Any request for permission to make a summary judgment motion	June 30, 2023	January 23, 2024

Respectfully submitted,

/s/ Terri L. Mascherin

Terri L. Mascherin (admitted *pro hac vice*)

David Pressman

Jason P. Hipp

JENNER & BLOCK LLP

*Counsel for Plaintiffs*

cc: Counsel of Record (via ECF)